



Dear Members of the Coal Policy Committee:

On behalf of Ram River Coal Corp. (“Ram Coal” or the “Company”), please accept this submission to assist the appointed Coal Policy Committee (the “Committee”) with its mandate to report and make recommendations to the Alberta Ministry of Energy (“Alberta Energy”) on a new coal policy. This new policy must reflect the interests of Albertans and Indigenous communities by balancing responsible resource development opportunities within the established environmental protections and land use Policies that exist today, and will continue to evolve in the future.

Ram Coal is supportive of Alberta Energy’s desire to implement a new coal policy and is committed to working effectively with the Committee and Albertans throughout the process. We recognize and understand concerns of Albertans as it relates to mining activities within the Eastern Slopes of Alberta and would like to do our part in sharing and contextualizing relevant information for all Albertans to consider.

Within this submission we aim to provide context for the Committee to consider around the 1976 Coal Development Policy, by highlighting some of the subsequent land use plans that have further refined the land categories and added additional protections outside the 1976 Policy, and reference how Alberta’s modern regulatory framework addresses many of the concerns the original Policy was intended to address. Ram Coal believes that the new coal policy for Alberta should reflect and complement these existing land use and regulatory frameworks. This will avoid overlap and confusion between different government policies, and will enable Indigenous communities, Albertans, and industry to all transparently understand Alberta’s expectations for responsible future coal development in Alberta.

Who we are

Ram Coal is a Canadian based, steelmaking coal development company that is in the planning stages of the Aries Project (the “Project”). The Project area is located in the Alberta foothills within the district of Clearwater County, approximately 40 kilometers west of the town of Rocky Mountain House (see Figure 1), within the North Saskatchewan Regional Planning area, and is located in what is known as “category 2 lands” classified under a 1976 A Coal Development Policy for Alberta (the “1976 CDP”).

The Company is supported by the Lundin Group. Founded over forty-five years ago, the Lundin Group of Companies comprises individually managed public and private companies focused on the resource sector. Their expertise ranges from early exploration to development and production. The Lundin Group of companies produce a variety of commodities and responsibly operate in over twenty countries worldwide.

The Lundin Group of Companies is headed by Lukas Lundin, a well-known and respected business leader, financier and philanthropist. Mr. Lundin has gained international success in the resource industry, spearheading numerous world-class discoveries and developments worldwide. Today, his companies are active around the world advancing precious and base metals projects through different mine life phases in their respective domains, and includes oil and gas operations within Alberta and across the globe. Mr. Lundin established the Lundin Foundation (<https://www.lundinfoundation.org/>) in 2006, a Canadian registered non-profit organization, to assist and support the Lundin Group of Companies in the design and development of community initiatives to create lasting benefits for communities from resource developments.

One of the key aspects of the success and global reputation of the Lundin Group has been the focus and commitment on community. The Lundin Foundation is an outgrowth of that commitment. The Foundation works with all the Lundin Group companies helping to make strategic investments in communities across the globe. Deeply embedded within the Lundin approach to sustainable development is a commitment to connect people with tools and knowledge that unlock economic prosperity. The Foundation elevates developmental practices across the Lundin Group, by assisting companies implement corporate-level Environmental, Social, and Governance (“ESG”) strategies and target setting around climate action, water management and biodiversity conservation while ensuring resource operations mobilize local economic opportunities and benefit surrounding communities. Since 2007 the Lundin Foundation alone has disbursed more than \$73 million USD into initiatives that enable local employment, nurture small business growth and support financially viable social and environmental solutions. The Foundation focuses on entrepreneurial opportunities that power lasting, sustainable impacts at the local level. Then, it looks for untapped market prospects and builds upon the inherent strengths of each community. When the project ends, its impact endures: community members have what they need to continue to contribute to the betterment of their societies. Working in some of the most environmentally sensitive areas in the world, the Lundin Foundation has won numerous awards and has been recognized by the United Nations.

Property Overview

Ram Coal is fortunate to hold coal leases which contain significant steelmaking coal resources. The majority of our coal leases pre-date the 1976 CDP and were issued in 1971 and 1972 to previous lease holders. The leases are divided into two adjacent properties; the Ram River Property, and the Scurry Ram Property (see Figure 1).

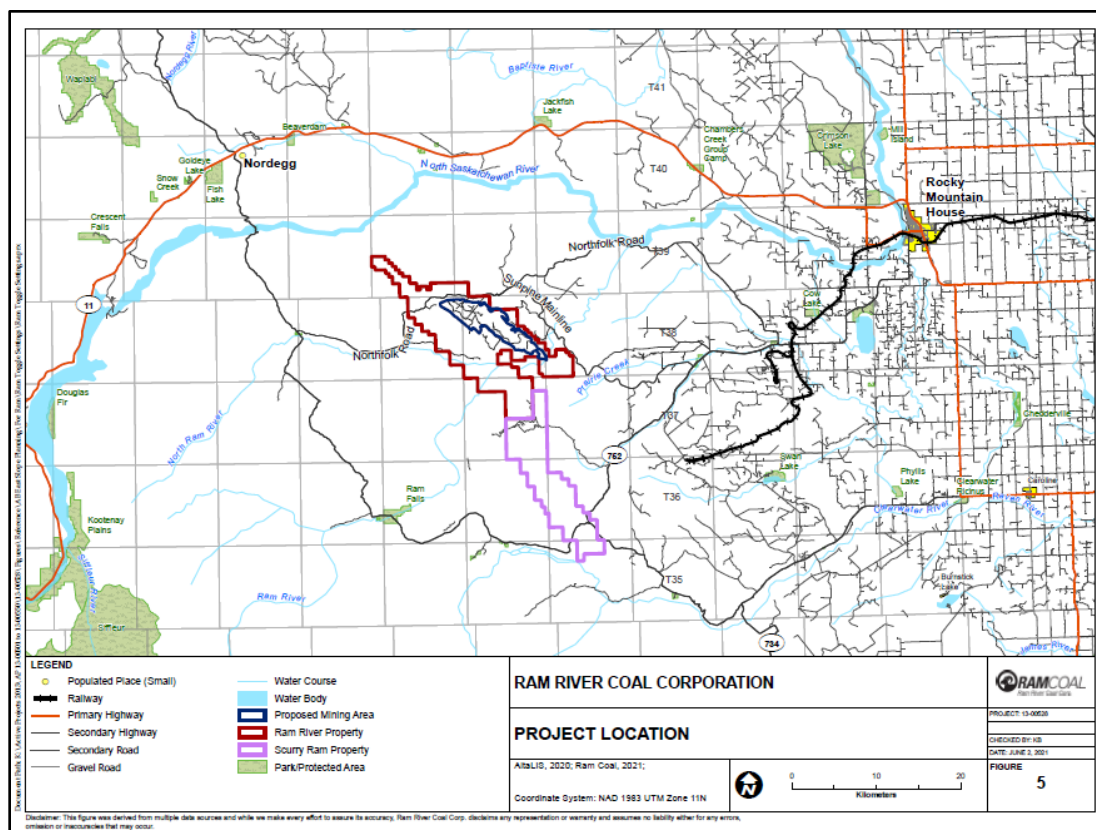
In 2019, Ram Coal commissioned an updated National Instrument (“NI”) 43-101 Coal Resource Report on its Ram River Property (the “2019 NI 43-101 report”) which estimated an in-situ measured and indicated resource of 403 million metric tonnes (“Mt’s”) with an additional 285 Mt’s of inferred estimated resource. A copy of the 2019 NI 43-101 report can be found on our website www.ramcoal.com.

The adjacent ¹Scurry Ram property has the potential to hold additional significant resources based on a historical estimated 438 Mt's, identified using guiding principles from the 1989 Geological Survey of Canada (GSC) 88-21 guidelines. Combined, the Ram River and Scurry Ram properties have the potential to hold over 1 billion tonnes of steelmaking coal and provide multi-generational employment and regional benefit opportunities.

Aries Project Overview

The Aries Project, with an estimated 30 + year mine life, is the most advanced portion of the Ram River Property. The Project contemplates the mining of approximately 200 Mt's of the estimated 403 Mt measured and indicated resources. Significant resources remain within the Ram River Property thereby providing future opportunities for expansion.

Figure 1. Project Location



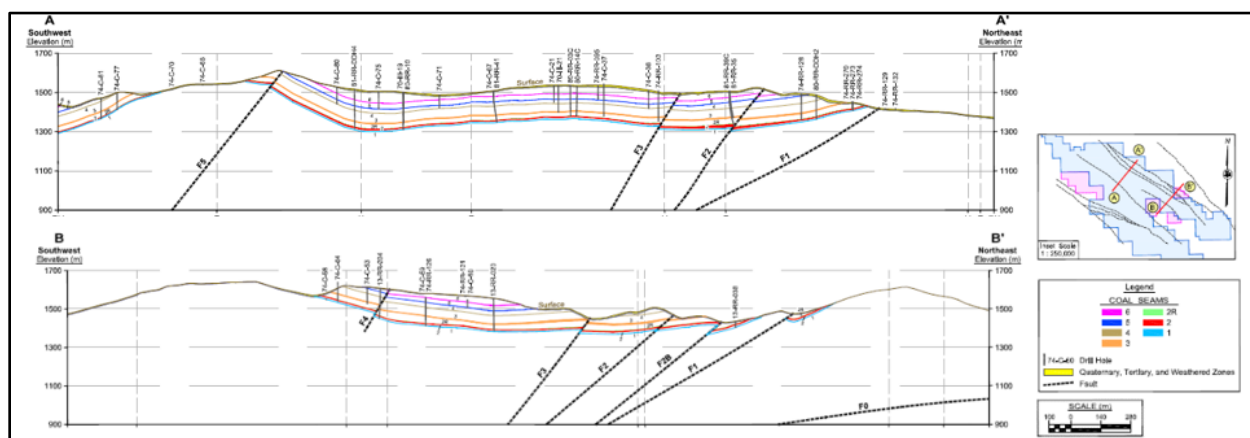
The Aries Project is unique for a Canadian steelmaking coal deposit, with simple to moderate geology and relatively flat-lying topography (see Figure 2). The Company has commissioned several engineering studies since 2013 in an effort to design a responsible and sustainable project which incorporates the favorable geology and natural topography, while ensuring potential

¹Within the meaning of NI 43-101, a Qualified Person has not done sufficient work to classify the Scurry Historical Estimate as current mineral resources or mineral reserves. Ram Coal is not treating the Scurry Historical Estimate as current mineral resources or mineral reserves (within the meaning of NI 43-101).

environmental effects are considered each step of the way. We are continually investigating opportunities to minimize potential environmental effects, while ensuring the project remains feasible throughout the projected 30+ year mine-life.

The natural topography and geology of the Aries Project enables the Company to establish a mining method while using progressive reclamation similar to what you might see at a prairie mine operation. The most recent independent engineering report completed in 2020, considered a surface mine operation which focused on minimizing the project disturbance and maximizing progressive reclamation efforts throughout the mine life. By initiating the mining sequence in a central part of the resource area where the coal comes near the surface, the company would only need to place a limited amount of waste rock outside the planned active mining area, which would be progressively reclaimed within the first five years. The balance of the waste rock would be maintained within the mining area as we progress through the deposit. This is advantageous as it would enable the Company to more effectively manage water that comes in contact with the newly exposed rock, primarily inside our active mining zone. While we still have more work to do to further understand the current conditions and potential effects, we continually seek to incorporate a multi-pronged approach towards our water management which includes; minimizing the size of the waste rock area, bottom-up design or layering of stockpiles, controlling flow of contact water, and, progressive and efficient reclamation. Should we determine that additional water treatment is required, our geology and local topography again enable us to effectively establish saturated rock fills within our mine planning, or consider other treatment technologies.

Figure 2. Geological Cross Section from 2019 NI 43-101 Coal Resource Report



The area surrounding the Aries project includes other industrial activities, such as hydroelectric dams, oil & gas developments, rock quarries and forestry activities. High-voltage power lines from the Bighorn Hydroelectric facility runs within 7km of the project area, enabling the Company to utilize a carbon free power source during its operations. Rail has been extended to within 30km of the project area to support oil and gas growth in the area.

The Company has been collecting environmental baseline data since the fall of 2013 in a proactive effort to understand the local conditions today, and in preparation of required Environmental Assessment (EA) applications. The Company anticipates it will have 10 years of local water quality baseline data before submitting an EA application, however note additional consultation with Indigenous communities and stakeholders will take place before any applications would be submitted to provincial and federal regulators.

Ram Coal is committed to responsible resource development initiatives and believes the temporary use of the land for mining can provide tremendous benefits to the province and the communities in the region. We acknowledge prior to any development being initiated, a rigorous regulatory review process and a transparent consultation process must take place which provides everyone involved in such a process an opportunity to consider the benefits and potential project effects. The 1976 CDP stated development will be encouraged in a manner that is compatible with the environment and that no development will be permitted unless the Government is satisfied such a development can proceed without unacceptable adverse effects to the environment and that satisfactory reclamation of any disturbed lands can be achieved. This type of process is clearly incorporated into the modern, transparent, and well-regulated EA processes which plays a major role prior to any project approvals.

Overlapping Land Use Plans and Policies

Following the release of the 1976 CDP, the Government of Alberta (“GoA”) has engaged Albertans and Indigenous communities on a number of subsequent land-use plans and policies which overlap the area and categories contained within the 1976 CDP. These subsequent plans and policies provided direction which often aligns with certain restrictions from the 1976 CDP, while also contradicting certain land-use intentions within certain categories from the 1976 CDP. It is important to note and recognize, the 1976 CDP predated Section 35 of the *1982 Constitution Act*, which recognized and affirmed the inherent and treaty rights of Indigenous peoples.

Several of the existing land-use plans and policies referenced in this submission include conflicting messages when compared to the 1976 CDP and has led to confusion and uncertainty for land use and environmental protections within the Eastern Slopes of Alberta from Indigenous communities, Albertans and Industry. Therefore, we recommend that the new coal policy reflect an integration of all GoA land and resource use plans that have been issued since the 1976 CDP. This integration is essential to Alberta’s growth and land management pressures and will provide the necessary clarity to all resource-based industries. The land-use considerations from mining (regardless of commodity), forestry, oil and gas, renewable energy projects and tourism, have to be considered under one framework, versus a number of overlapping policies. This can be achieved under the *Alberta Land Stewardship Act* by utilizing the existing Land Use Framework and provincial regional plans.

The current coal policy consultation and public land use debate surrounding the 1976 CDP category system is a clear example of the need to integrate all outstanding plans. When considering the subsequent land use plans and policies that followed the 1976 CDP, there is

significantly more protection in place today than was established from the 1976 CDP. A recommendation to adequately address the coal category system is to simply utilize the established GoA Land-use Classification System and Management Intents found within the established land-use plans that followed the 1976 CDP.

1976 Coal Development Policy

Ram Coal's steelmaking coal properties fall within lands classified as category 2 lands under the 1976 CDP. Similar to each of the four categories associated with the 1976 CDP, category 2 lands reference certain restrictions for coal developments. It is important to note the Company has received various legal opinions and a letter from Alberta Energy in 2016, which noted category 2 lands from the 1976 CDP does not automatically prohibit surface coal mine development.

The basis of Alberta Energy's 2016 letter was to provide regulatory clarity and noted the land-use intent for category 2 lands had yet to be fully determined in 1976. The letter touched on the current (2016) context:

- Land-use intent within the subsequent established integrated resource plans in the area of the Aries project, allow for the development of the Ram River coal field;
- Key infrastructure had been developed in the region since 1976 which could support a mine development;
- Environmentally sensitive areas have been identified in subsequent integrated resource plans; and
- Any proposed project would need to consider these points and more as part of an EA process.

A question under the current Coal Policy Committee's Terms of Reference was "what is Albertans understanding of the Coal Policy"? This could be a difficult question for many to answer based on the ambiguous language used, and without consideration of the various land-use and resources plans that followed. Like many government policies, the 1976 CDP included ambiguous language to allow for changing conditions over the years; however, suggest the policy of the day was not intended to remain unchanged for 45 years. This is evident when reviewing resource plans from the 1980's, which stated the coal policy was being revised at that time, however had yet to be amended or updated as was previously considered. It would have been interesting if the aforementioned question included "what is Albertans understanding of the overlapping land use plans and protections that exist within the Eastern Slopes aside from the Coal Policy"?

The category system associated with the 1976 CDP, or primarily category 2 lands, has been a discussion point with a number of stakeholders throughout the years. Many Albertans and external stakeholders often reference the summary table² on page 18 of the 1976 CDP which notes "Restricted development – underground or in-situ only" for category 2 lands; however, the

² Table 1, page 18 1976 Coal Policy

detailed summary for category 2 lands³, does not state it prohibits surface mining or exploration, or that surface mining would not be considered. After a comprehensive review of the 1976 CDP and subsequent land-use and resource plans, the GoA can consider responsible coal developments throughout certain areas of category 2, 3 and 4 and other areas identified through subsequent land-use planning. Such efforts allow the GoA to strike a balance of Environmental, Social, and Governance (ESG) goals. One could suggest the 1976 CDP was the first GoA policy to consider what is commonly referred to as ESG throughout its make up, making it “ahead of its time”, from a policy standpoint.

Note below a few references which relate to land-use aspects from the 1976 Coal Policy:

- *Exploration and development will be encouraged in a manner that is compatible with the environment*⁴
- *No development will be permitted unless the Government is satisfied that it may proceed without irreparable harm to the environment and satisfactory reclamation of any disturbed lands. Neither exploration nor development will be permitted in certain designated areas. Limited exploration and development will be permitted in certain areas, while other areas will be broadly open for development under controlled conditions.*⁵
- *The Government is committed to maintaining a balance between resource development and environmental protections in order to maintain a desirable quality of life for future Albertans.*⁶
- The area for Category 2⁷ includes the following details;
 - *limited exploration is desirable and may be permitted under strict control*
 - *commercial development by surface mining will not normally be considered at present time*
 - *category contains lands for in the Rocky Mountains and Foothills for which the preferred land and resource use remains to be determined, or areas where infrastructure facilities are generally absent or considered inadequate to support a major mining operation*
 - *category contains local areas of high environmental sensitivity in which neither exploration or development activities will be permitted (these areas were not identified in the 1976 CDP)*
- *The Government emphasizes the present classification, while based upon the best available knowledge, is subject to review in light of changing knowledge and new technology related to environmental protection, reclamation and mining methods*

³ Page 15 of the 1976 Coal Policy

⁴ Section 2 Genal Statement of Summary page 3

⁵ Section 2 Genal Statement of Summary page 3

⁶ Section 3.1 Protection of the Environment page 5

⁷ Section 3.13 Classification of lands for Coal Exploration and Development – Category 2 page 15

The 1976 CDP is now 45 years old, and while many of its guiding principles continue to apply (such as allowing new coal mine projects only where it can demonstrate that there will not be unacceptable effects to the environment and where reclamation can be satisfied for all disturbed land), some of the specific regulatory mechanisms contained in the policy are outdated. For example, the policy requires that all coal mining projects be made conditional on a degree of equity participation in the project by Albertans and states that the GoA will exercise overall control on the timing of each coal mining development (including deferring specific developments). This reflects the context of the 1970's in Alberta, when new coal mine proposals were outpacing the capacity of provincial regulators and when the GoA played an active role in the natural resource industry (for example, the government in the 1970's set prices for natural gas and owned a 50% stake in the Alberta Energy Company). Since that time, the GoA has adopted a more market-based, light-handed regulatory model that allows market conditions to dictate the need for, and timing of, new projects. Although the 1976 CDP has not been formally amended, it is clear that the above components of the Policy are no longer enforced.

The 1976 CDP overlaps the protection of some of the most sensitive areas of the province within category 1, while subsequent land and resource plans have enhanced the protections of the Eastern Slopes by the incorporation of Prime Protection Zones, Critical Wildlife Zones, Conservation Areas, and Recreation and Park Areas, within category 2 and 3 lands. The language found within the 1976 CDP, which reference areas of environmental sensitivities, has been identified in subsequent regional and sub-regional land and resource plans, therefore more protections exist within the Eastern Slopes of Alberta today, than were provided by the 1976 CDP.

1983 Directive 61 – How to Apply for Government Approvals of Coal Projects in Alberta

While Directive 61 was updated in 2020 and renamed “*Manual 020 Coal Development*”, it is important to note the connection Directive 61 had with the 1976 CDP of the time, as it related to the category system. In 1978, the GoA released Directive 61 (revised in 1983) which was intended as a working guide for industry to assist in applying for government approvals for a coal project. In this guide, it emphasizes the coal land classification was subject to review and the government will review applications for a classification change. The information requirements for such an application outlined in Directive 61 were quite similar to the information requirements for a modern EA per today's regulatory system.

Directive 61 detailed a company would have to initially submit letters to certain Ministries and request certain lands be reclassified, prior to entering a modern, transparent, and rigorous legislated EA process.

While Directive 61 no longer exists, it is important to note the language which references the coal classifications was subject to review and an existing process for reclassification.

1984 Eastern Slopes Policy

The 1984 Eastern Slopes Policy (“ESP”) was established as a resource management policy for all public lands and all resources within the region. It was developed to ensure public lands and resources within the Eastern Slopes are protected, managed or developed according to a philosophy of integrated resource management. Unlike the 1976 CDP, the ESP referenced engagement with Albertans to identify the views and concerns of the public as it relates to land-use and resource development within the region.

This policy formed the regional base for more detailed sub-regional plans which were later implemented throughout the Eastern Slopes. The ESP recognized other government policy statements, such as the 1976 CDP, and stated *all such policies which have implications for the protection, management, and development of resources in the region must conform with the intent of the ESP*⁸.

The ESP identified Compatible Activities in a table on page 15 which identified eight Land Use Zones, which broadly covered Protection, Resource Management, and Development within the region. Coal exploration and development is identified as an activity, and is aligned with other industrial activities such as Logging, Petroleum and natural gas exploration, and Mineral exploration and development. The Aries project is within the Multiple Use Zone, for which coal exploration and development is a Compatible Use⁹ within the ESP framework.

The ESP’s Prime Protection Zone covers much of the same area as the 1976 CDP category 1 lands. Critical Wildlife Zones overlap areas within category 2 and 3 lands from the 1976 CDP, thereby enhancing the protections of the Eastern Slopes as it relates to potential coal developments while considering all regional land-use objectives. The ESP considered a range of opportunities in the region while balancing the environmental, social, and economic goals in the process. It further introduces the more detailed Integrated Resource Planning (“IRP”) system which describes how the resource objectives for each region can be achieved.

Maps illustrating the location of the Ram Coal’s leases and project area in association with the 1976 CDP and overlapping land use and IRP land designations is provided in Appendix A.

1986 Sub-Regional Integrated Resource Plans

Two Sub-Regional IRPs introduced in 1986 cover the Ram Coal Properties. Both the Nordegg-Red Deer River and the Rocky-North Saskatchewan Sub-Regional IRPs are planning documents prepared by government and public consultants for improved management of Alberta’s land and resources. Each plan presents the GoA’s resource management policy for the public lands and

⁸ Page 5 of ESP – Other Government Policy Statements

⁹ Page 15 of ESP – Compatible Use – “*Uses that are considered to be compatible with the intent of a land use zone under normal guidelines and land use regulations*”

resources within the area. Each IRP is intended to be a guide to resource managers, industry, and the public having responsibilities or interests in the area.¹⁰.

Details contained within each of the IRPs allow for the consideration of responsible coal development and both IRPs make specific reference to the Ram Coal deposits as opportunities in Management Objectives.

1986 Nordegg-Red Deer River Sub-Regional IRP

Details of note within the Nordegg-Red Deer River IRP includes:

- Highlight Summary¹¹ of the IRP states *“The plan encourages coal development over a large area currently under restriction (Category 2) under the 1976 Coal Policy, while prohibiting coal activities in a valuable wild land portion of this restricted area”*.
- Only Category 1 lands under the 1976 CDP were identified in which no exploration or development will be permitted. Other categories provide varying degrees of restrictions on coal related activities¹². It stated the coal policy was being revised but not yet approved (1986), however the revised coal policy may rely on the IRP to provide direction on coal development activities. This IRP anticipated the change and contains objectives and guidelines for coal activities without relying on land classification of the 1976 CDP.
- Mineral Resources¹³:
 - A broad objective is to provide opportunities for industry to define and develop minerals where proven reserves or productive formations exist.
 - *Mineral resource activity will continue to be approved following government referral procedures and according to legislation*
 - A broad guideline that only underground coal mining is encouraged in the Critical Wildlife zones. However, where not otherwise prohibited in this IRP, surface mining in the Critical Wildlife zone may be considered on a project specific basis.
- Identified in the Resource Management Objective for the Ram – Clearwater area it states¹⁴:
 - To provide opportunities for industry to assess and develop the Ram River coal fields and to explore for other coal deposits

¹⁰ Preface of Nordegg-Red Deer River & Rock-North Saskatchewan IRP's.

¹¹ Page v Nordegg-Red Deer River IRP

¹² Page 19 of Nordegg-Red Deer River IRP - section 2.3 A Coal Development Policy for Alberta

¹³ Page 38 & 39 Nordegg-Red Deer River IRP

¹⁴ Page 96 Nordegg-Red Deer River IRP

1986 Rocky-North Saskatchewan Sub-Regional IRP

Key language to note within this IRP includes:

- During the public involvement process an area of concern was excessive restrictions on coal development¹⁵.
- The Rocky-North Saskatchewan IRP utilizes the zoning categories and the table of compatible activities from the Eastern Slopes Policy. These boundaries were modified during the Rocky-North Saskatchewan IRP¹⁶
- The IRP stated the coal policy was being revised (1986) and the revised policy will rely primarily on the IRP planning system for direction and consider the context of all land and resource uses on public lands¹⁷
- It highlights the established Ram River coal deposit and a large area remains to be assessed based on excellent potential of large coal reserves¹⁸
- A broad management objective¹⁹ is to provide opportunities for industry to develop resources where reserves have been proven, particularly coal associated with the known Ram River coal field.
- A broad management guideline²⁰ references the fact that only underground coal mining is encouraged in the Critical Wildlife zones. However, where not otherwise prohibited in this IRP, surface mining in the Critical Wildlife zone may be considered on a project specific basis
- The Ram River property falls within the Rocky-North Saskatchewan Resource Management Area (“RMA”). Resource Management Strategy²¹ stated the primary intent is to provide the use of industry, including coal and certain objectives and guidelines were developed for indicated resource sector.
- Management Objective²² is to provide opportunities for industry to explore and develop coal resources, particularly coal associated with the known deposits, such as the Ram River coal field.
- Chapters 8 and Chapter 9 ²³should be reviewed as it discusses Plan Implementation, Amendment and Implications. *The Rocky-North Saskatchewan IRP will be implemented within the existing government framework of legislation, agency responsibilities, policies and admin mechanisms.*

¹⁵ Page V Rocky-North Saskatchewan IRP

¹⁶ Page 10 Rocky-North Saskatchewan IRP

¹⁷ Page 14 Rocky-North Saskatchewan IRP

¹⁸ Page 23 Rocky-North Saskatchewan IRP

¹⁹ Page 24 Rocky-North Saskatchewan IRP

²⁰ Page 24 Rocky-North Saskatchewan IRP

²¹ Page 59 Rocky-North Saskatchewan IRP

²² Page 62 Rocky-North Saskatchewan IRP

²³ Page 97 & 100 Rocky-North Saskatchewan IRP

Land Use Framework – North Saskatchewan Regional Plan

In 2008, the GoA released a Land-use Framework to set out a new approach to managing the provinces land and natural resources. The framework would provide a decision-making blueprint for *sustaining a growing economy and balancing social and environmental goals*. Alberta introduced the *Alberta Land Stewardship Act (“ALSA”)* in 2009, which provided legislation that governs the establishment and implementation of seven different regional plans.

Two of the seven provincial regions have completed their respective Regional Plans, the Lower Athabasca Regional Plan (“LARP”) and the South Saskatchewan Regional Plan (“SSRP”). Each of these two plans included substantial public and Indigenous engagement and have taken between four and five years before being approved by government. The Ram Coal properties fall within the North Saskatchewan Regional Plan (“NSRP”), which was scheduled to be the third plan completed within the framework. The public process began with Phase 1 consultations in 2014 and “potentially” concluded in 2018 with the appointed Regional Advisory Committee (“RAC”), providing its recommendations to the government. There has been no advancement following the RAC recommendations and it remains unclear what the next potential steps may include.

Under the ALSA, these regional plans will legislate land use directives which would supersede or incorporate previous land use policies or plans. In the SSRP, it was noted that the government would review the coal categories from the 1976 CDP to confirm whether the coal classification should remain or be adjusted²⁴, however such a review would only be for the SSRP area.

In the NSRP RAC’s recommendations (2018), the RAC referenced the GoA was assessing opportunities to update the 1976 CDP²⁵ and recommended the GoA should ensure that a review was completed before releasing the final NSRP, in an effort to provide certainty to industry and investors.

Land and Resource Use Plan summary

As reflected in the above sections, there is an abundance of conflicting language found within the various land and resource use policies in Alberta pertaining to potential coal exploration and development when compared to the language found within the 1976 CDP. It’s important for Alberta Energy, and Environment and Parks, to provide the clarity that Albertans and Industry requires to move forward. The outdated 1976 CDP included regulatory mechanisms which are no longer applicable based on the implementation of subsequent legislation as it relates to coal developments, including the modern EA regulatory framework. As noted in the 1986 IRP’s, they stated the coal policy was being revised at that time and further referenced the land use designations associated with the coal category systems were considered in the creation of the ESP and applicable IRPs. However; it is unclear why the 1976 CDP was never officially revised at that time, or why the land zoning from the IRP’s which incorporated consultation with the affected stakeholders, are not considered to have updated the 1976 CDP’s land classification

²⁴ Page 61 South Saskatchewan Regional Plan 2014-2024

²⁵ Page 87 Advice to the Government of Alberta for the North Saskatchewan Regional Plan

system or are commonly referred to when discussing land-use pressures today from coal exploration and development.

It is important to note the pressures on the environment from potential coal exploration and development are similar to the pressures from other metal and mineral sectors. Decisions made as part of a new coal policy, must be transferable to other metal and mineral initiatives the GoA is considering. This would include any amendments to the Mine Financial Security Program, administrative procedures or royalty framework. When you consider the exploration and development of rare earth elements, lithium, precious and base metals, or coal, a well understood and transparent policy framework must exist for Industry and Albertans that does not arbitrarily discriminate between different resources.

Submission Summary

Acknowledging the numerous submissions with varying views on a new coal policy, it's clear the Coal Policy Committee has a difficult task ahead. It's unfortunate Alberta Energy rescinded the Policy in the manner it did, and while the Ministry admitted their mistake, it has caused a ground swell of concern for the protection of Alberta's Eastern Slopes. It is important to reiterate, that when reviewing each of the land and resource plans referenced in this submission, each of them reference the importance of Alberta's headwaters and watershed management within the Eastern Slopes. Even without the 1976 CDP land categories, the management of the headwaters have always been front and center in all land-use plans that have been developed across the Eastern Slopes. We feel responsible mining can occur in many parts of the province and acknowledge there are areas of the Eastern Slopes that are and should remain protected from any resource development. Canada and Alberta have a world-class, robust regulatory process and industry has advanced its ability to responsibly operate in environmentally sensitive areas. We hope this submission provides more clarity around the various land-use protections that exist within the Eastern Slopes today from policies and plans that have followed the 1976 CDP.

To assist the committee and other interested parties who review this submission, we have summarized some of the key points that we wish to reiterate in this submission:

- Ram Coal is supported by the Lundin Group of Companies, who have the technical and financial expertise to develop a responsible and sustainable project in Alberta.
- The company holds large steel-making coal resources with multigenerational mine life potential.
- The Aries project is located in the North Saskatchewan Regional Planning area with a combined geology and topography which is unique for a Canadian steel-making coal project and can be advantageous for water management considerations.
- The 1976 CDP only prohibited coal exploration and mining in Category 1 lands, which have been further protected from coal developments through subsequent land use planning.

- Subsequent to the 1976 CDP, areas within categories 2 and 3 of the 1976 CDP have had additional restrictions and protections implemented via the Eastern Slopes Policy, Integrated Land & Resource Use Plans, and the Land-Use Framework (“LUF”). Today, thanks to the various Land -use Plans and IRP’s, there is significantly more protection within the Eastern Slopes of Alberta, than were provided by the 1976 CDP.
- The Aries project area is identified as a Multiple Use Zone within the Eastern Slopes Policy, highlighted by other existing industrial activities within the region and the build out of infrastructure since 1976.
- The Ram Coal resources have been identified and referenced in subsequent resource and land use plans following the 1976 CDP, each of which referenced the desire to advance the coal properties.
- Alberta’s Land-use Framework incorporated extensive consultation with Albertans and Indigenous communities, and was created as a new approach to managing lands and natural resources to achieve Alberta’s long-term economic, environmental and social goals. A new coal policy must take direction from the already established land-use plans, as they consider all natural resources while balancing a healthy ecosystem and environment.
- The new coal policy should conform to the LUF and existing land and resource use plans to avoid conflicting land-use designations which may lead to confusion and uncertainty in the years ahead as these LUF plans are amended as planned. Established Land-Use planning across Alberta considers a regional approach, as the pressures and environmental sensitivities (eg. water allocations, species of concern, biodiversity, Indigenous and non-Indigenous land-use, etc.) vary across the province, including within the Eastern Slopes. Therefore, a blanket approach to coal specific land-use designation that is outside the LUF will continue to cause confusion and uncertainty.
- Alberta and Canada have a transparent and robust regulatory system which includes extensive consultation which must be followed before any development will be permitted to proceed. The regulatory process must consider the applicable project scientific data, environmental baseline conditions in the project area, Indigenous knowledge, and the existing environmental legislation in place before a regulatory decision is finalized. This context should be recognized in the new coal policy.
- Environmental pressures from coal exploration and development are similar to the pressures from other metal and mineral sectors. Decisions made as part of a new coal policy, must be transferable to other metal and mineral initiatives the GoA is considering.
- A new coal policy should set out the general parameters for coal exploration, development, operations, and reclamation which are aligned with (and do not seek to duplicate or conflict with) existing land use plans and regulatory processes. A transparent and rigorous Environmental Assessment process is intended to consider each project separately, evaluating the specific environmental sensitives and cumulative effects for each project. The new coal policy should rely on this existing regulatory

framework and should not assume that all coal developments will have the same environmental impacts.

- Lastly, responsible development of some of Alberta's coal resources can be achieved, thereby creating economic opportunities in rural and Indigenous communities in parts of the province.

In closing, Ram Coal would like to thank the committee members for their time and hope that all who review this submission find it informative and constructive. Albertans, Indigenous communities and Industry, look forward to receiving clarity on a new coal policy later this year.

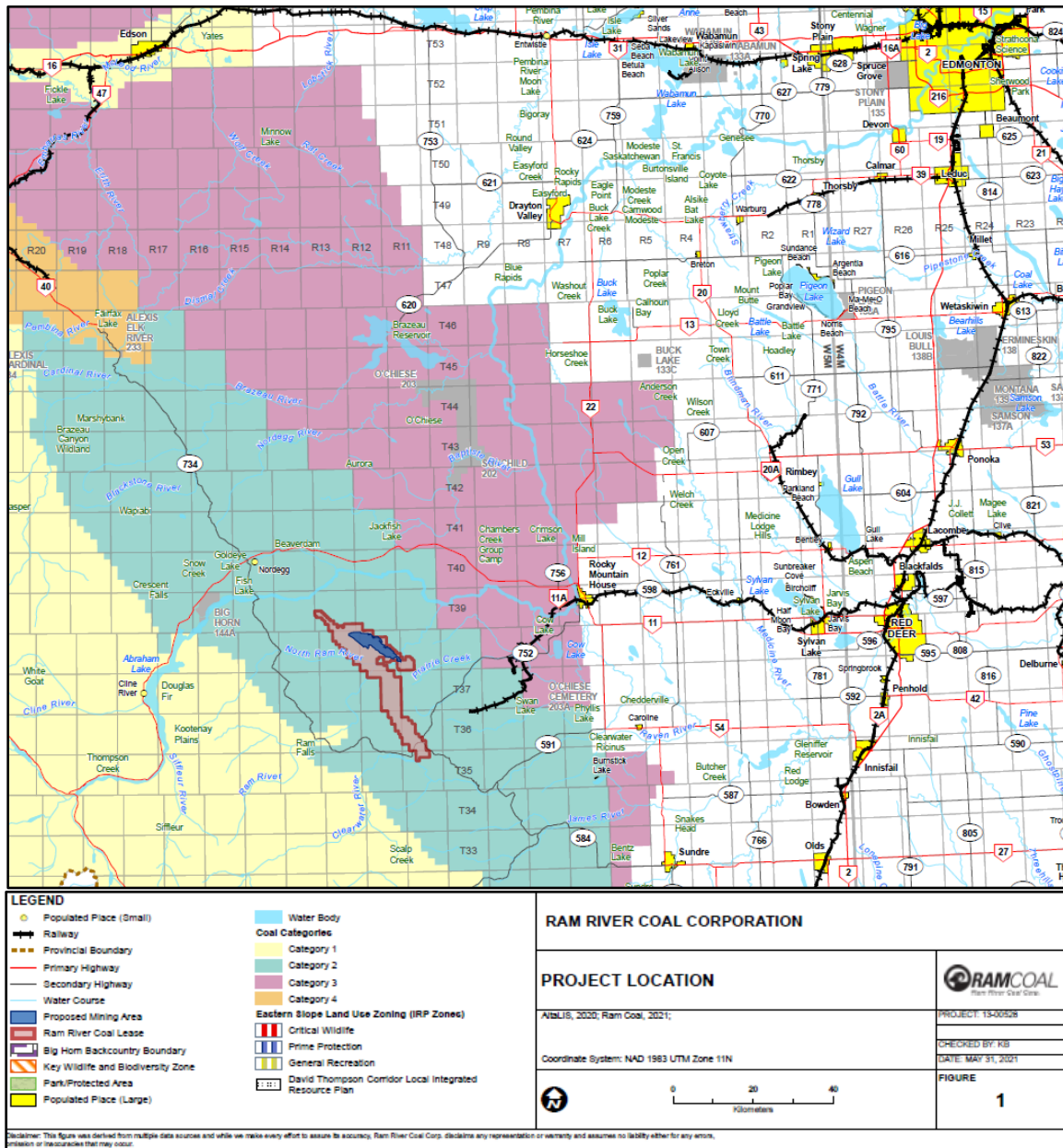
Sincerely;

A handwritten signature in cursive script that reads "Ken Brophy".

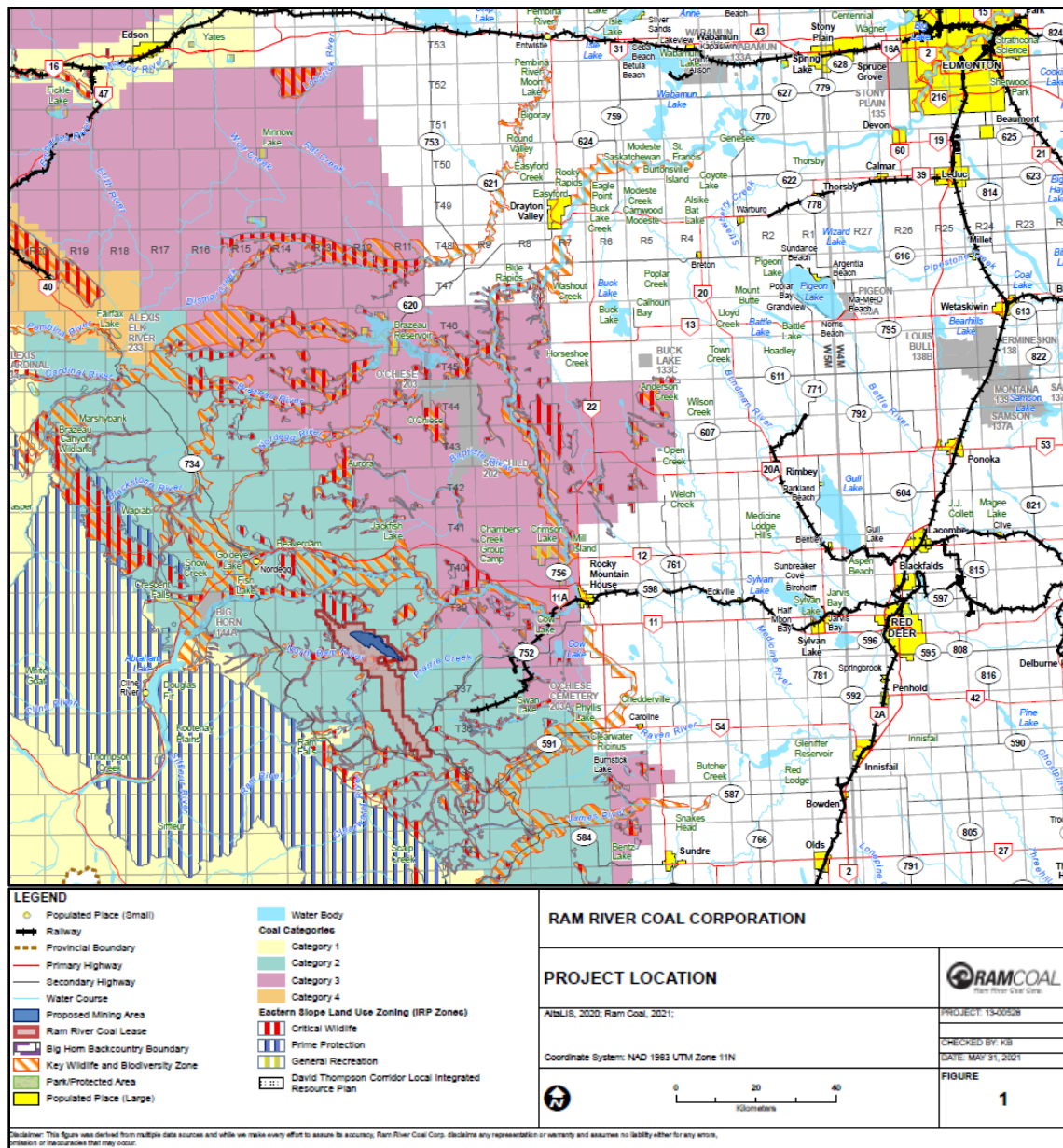
Ken Brophy
President
Ram River Coal Corp.

APPENDIX A

Regional 1976 Coal Categories only



Regional 1976 Coal Categories with subsequent ESP and Wildlife and Biodiversity Zones



Regional 1976 Coal Categories with subsequent ESP, Wildlife and Biodiversity and PLUZ's

